



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

September 1, 2020

BY CM/ECF

The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

**Re: *United States v. Mahmud Abouhalima*
 93 Cr. 180 (LAK)
 20 Civ. 834 (LAK)**

Dear Judge Kaplan:

The Government respectfully submits this letter in response to Defendant Mahmud Abouhalima's *pro se* motion under Federal Rule of Civil Procedure 59(e) (Civil Docket No. 13) to alter or amend the amended judgment of conviction entered by the Court on July 17, 2020, which orders payment of \$250 million in restitution and a \$250,000 fine to be paid "immediately" (Docket No. 962 at 7-8). The defendant correctly points out that the Second Circuit previously modified Abouhalima's original judgment to indicate that "each defendant's fine and restitution obligations come due only if he receives income from the sale of his account of the World Trade Center bombing or of the events leading up to it." *United States v. Salameh*, 261 F.3d 271, 277 (2d Cir. 2001). As a result, the Government does not object to altering the Court's judgment of conviction on July 17, 2020 to reflect the Second Circuit's ruling in *Salameh*.

Respectfully submitted,

AUDREY STRAUSS
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cc: Mahmud Abouhalima (by mail)